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ROWLAND MARCUS ANDRADE

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No.: 20-CR-00249-RS

**APPLICATION BY DEFENDANT FOR
TRANSPORTATION EXPENSES
PURSUANT TO 18 U.S.C. § 4285**

Defendant Rowland Marcus Andrade has been found to be indigent and to qualify for funding under the Criminal Justice Act. Defendant hereby applies, pursuant to 18 U.S.C. § 4285,

APPLICATION BY DEFENDANT FOR TRANSPORTATION EXPENSES PURSUANT TO 18 U.S.C. § 4285

1 for travel expenses to attend a remote session of trial testimony which will take place in
 2 Washington, D.C. Mr. Andrade will not be available to travel to the airport prior to the close of
 3 court proceedings to be held on February 21, 2025.

4 To ensure the orderly progress of the trial and the most efficient use of time, the parties
 5 stipulated, and the Court has ordered, that the United States Marshal take all reasonable steps to
 6 ensure that testimony take place as scheduled, including¹:

7 1) Defendant Rowland Marcus Andrade shall be booked on a non-stop flight that arrives
 8 in Washington D.C. no later than Saturday, February 22, 2025.

9 2) Defendant Rowland Marcus Andrade shall be booked on a non-stop flight from
 10 Washington D.C. to San Francisco, the same day as the close of testimony that the defendant will
 11 attend. The Marshal will do everything reasonably possible to ensure that Mr. Andrade return to
 12 San Francisco in time to appear at his trial on 8:30 a.m. the day after the close of the testimony
 13 taken in Washington, D.C.

14 The parties have also agreed, and this Court has ordered, that payment will be furnished
 15 by the U.S. Marshal as requested. ECF-524 at 2:25-3:1.²

17 ¹ Full text of this portion of the Court's order provides: "While Andrade's travel is under
 18 complete control of the United States Marshal, the U.S. Marshal and Defendant Andrade
 19 understand that they shall take all reasonable steps to ensure that Abramoff's testimony can start
 20 at 8:30 a.m. Pacific Time on February 24, 2025. Such reasonable steps include booking Andrade
 21 a non-stop flight that arrives in Washington, D.C. no later than Saturday, February 22, 2025.
 22 Likewise, the United States Marshal shall book Andrade a non-stop flight from Washington,
 23 D.C. to San Francisco the same day as the close of Abramoff's testimony. Andrade will make all
 24 reasonable efforts to return from Washington, D.C. to the courtroom in San Francisco so that
 25 trial is not interrupted or delayed. This may require Andrade to take a late evening or overnight
 26 flight following the conclusion of Abramoff's testimony. Working with the United States
 27 Marshal, Andrade will make all reasonable efforts to return to San Francisco so that trial in San
 28 Francisco can resume at 8:30 a.m. Pacific Time the day after the close of Abramoff's testimony. Accordingly, the Court directs the United States Marshal to do everything reasonably possible to ensure that Mr. Andrade can return to San Francisco in time to be present at 8:30 a.m. Pacific Time the day after the close of Abramoff's testimony." ECF-524 at 3:1-16.

² "Pursuant to 18 U.S.C. § 4285, the United States Marshal shall furnish the fare for Andrade's transportation from San Francisco to Washington, D.C. and back from Washington, D.C. to San Francisco because Andrade's personal appearance at Abramoff's testimony in Washington, D.C. and Andrade's return to trial in San Francisco is required." *Id.*

1 Therefore, Defendant applies for an order directing the United States Marshal to provide
2 Mr. Andrade with air-transportation, and payment for any related ground transportation to his
3 destination at Winston & Strawn, LLP, *see* ECF-524 at 2:1-2, located at 1901 L St NW,
4 Washington, DC, 20036, and to and from hotels and airports, as necessary.

5 Defendant also request an order directing the U.S. Marshal to communicate with
6 Defendant's counsel as needed to accomplish the purpose of this Order.

7 DATED: February 6, 2025

Respectfully Submitted,

8 /s/

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KING & SPALDING LLP, by:
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11 and by CINDY A. DIAMOND
12 Attorneys for Defendant
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